



January 4, 2024

Auditor Timothy M. O'Brien, CPA
Office of the Auditor
City and County of Denver
201 West Colfax Ave., Dept. 705
Denver, Colorado 80202

Dear Mr. O'Brien,

The Office of the Auditor has conducted a performance audit entitled "Residential Permitting." This memorandum provides a written response for each reportable condition noted in the final draft of the Auditor's report, which was sent to us on December 13, 2023. This response complies with Section 20-276 (c) of the Denver Revised Municipal Code.

Please see the subsequent pages for our responses to each recommendation and contact me at evelyn.baker@denvergov.org with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Evelyn Baker".

Evelyn Baker
Deputy Executive Director, CPD

cc: Valerie Walling, CPA, Deputy Auditor
Dawn Wiseman, CRMA, Audit Director
Sonia Montano, CGAP, CRMA, Senior Audit Manager
Shaun Wysong, MA, Audit Manager
Kristin McCormack, JD, Audit Manager
Jill Jennings Golich, Acting Executive Director, CPD

AUDIT FINDING 1

A lack of manager oversight and documented processes delays review times

RECOMMENDATION 1.1	
Develop a formal training plan	
<p>The Department of Community Planning and Development should develop a written, formal training plan for the residential plan review team that, at a minimum, specifies:</p> <ul style="list-style-type: none">• The types of training required and how often each training should be taken after a staff member is hired (e.g., once, annually).• How training will be tracked and documented.• Which staff member is responsible for tracking and documenting training.• How often the training plan should be reviewed and updated.• Requirements for individual training plans that ensure a focused approach to staff training and development needs.	
Agency response	Agree
Target date to complete implementation activities (Generally expected within 60 to 90 days)	3/1/2024
Specific point of contact for implementation	Name: Eric Browning
	Phone: 720.865.28115
Provide a written response	
<p>While the supervisor of each plan review related workgroup in CPD has new hire onboarding and team training identified as a core responsibility, CPD acknowledges that the documentation of the training process has not been standardized.</p> <p>In January 2024, CPD rolled out a standardized framework for training expectations across all plan review related work groups, including the Residential Plan Review team. The completed plan for each team shall include, at a minimum, the elements listed in this recommendation. It is our expectation that the training documentation for the Residential Plan Review team will be completed by February 29, 2024.</p> <p>We anticipate that this documentation will continue to evolve/be updated as needed on an ongoing basis.</p>	

RECOMMENDATION 1.2

Review, update, and finalize training guidance

The Department of Community Planning and Development should review its training documents and guidance for the residential plan review team to determine what information should be included in the training plan. The training plan should then be updated and finalized.

Agency response	Agree
Target date to complete implementation activities (Generally expected within 60 to 90 days)	6/28/2024
Specific point of contact for implementation	Name: Eric Browning
	Phone: 720.865.2815

Provide a written response

This recommendation builds off the Recommendation 1.1. After completion of the general training framework described in our response above, we anticipate that the more detailed documentation for the specific training to be provided to the Residential Plan Review Team will be completed by June 28, 2024.

We anticipate that this documentation will continue to evolve/be updated as needed on an ongoing basis.

RECOMMENDATION 1.3

Written guidance for oversight and monitoring

The Department of Community Planning and Development should develop and document written policies and procedures for how to oversee and monitor plan reviews completed by the residential plan review team. These documents should specify the types and frequency of oversight, who should conduct the oversight, and how it should be documented.

Agency response	Agree
Target date to complete implementation activities (Generally expected within 60 to 90 days)	3/29/2024

Specific point of contact for implementation	Name:	Eric Browning
	Phone:	720.865.2815
Provide a written response		
<p>This is another example of a core expectation for all supervisors of plan review related workgroups in CPD. While the supervisors for each workgroup do currently perform quality control, there is an opportunity to provide a standardized framework for such activities. CPD agrees that these expectations should be documented for each plan review related workgroup and expects to have the broad outlines of quality control reviews for residential plan reviews drafted by March 29, 2024.</p> <p>As with the other recommendation responses above, we anticipate that this documentation will continue to evolve/be updated as needed on an ongoing basis.</p>		

RECOMMENDATION 1.4		
Develop policies and procedures for monitoring contracted staff		
<p>The Department of Community Planning and Development should develop and implement policies and procedures for how it will monitor all requirements in contracts with third parties that support the city's residential plan reviews.</p>		
Agency response		Agree
Target date to complete implementation activities (Generally expected within 60 to 90 days)		3/29/2024
Specific point of contact for implementation	Name:	Evelyn Baker
	Phone:	720.865.2823
Provide a written response		

CPD agrees generally with the recommendation to document and implement a consistent process for monitoring requirements in contracts with third parties. However, we do want to acknowledge that the current system of having a contract administrator in our Finance and Accounting workgroup, partnered with a project manager/subject matter expert to oversee the details of the project and to monitor and approve all invoices for payment, has been successful in ensuring the proper administration of CPD contracts to date.

RECOMMENDATION 1.5

Appoint a contract administrator

The Department of Community Planning and Development should appoint a contract administrator or dedicated staff member to oversee contracts with third parties that support the city's residential plan reviews and ensure that all elements of the contract monitoring policies and procedures developed in Recommendation 1.4 are met.

Agency response

Disagree

**Target date to complete implementation activities
(Generally expected within 60 to 90 days)**

Click or tap to enter a date.

**Specific point of contact for
implementation**

Name:

Evelyn Baker

Phone:

Provide a written response

CPD does currently have a designated contractor administrator in place within our Finance and Accounting work group. In addition, for the Bureau Veritas contract described in this report, a specific team was clearly identified as a point of contact for the contractor and to oversee the contract management of this effort.

RECOMMENDATION 1.6

Develop and implement policies and procedures for website updates

The Department of Community Planning and Development should develop and implement policies and procedures to periodically evaluate and update online guidance related to the residential plan review process to ensure it aligns with current practices.

Agency response	Agree
Target date to complete implementation activities (Generally expected within 60 to 90 days)	2/29/2024
Specific point of contact for implementation	Name: Alexandra Foster
	Phone: 720.865.2969

Provide a written response

This recommendation aligns with work that Community Planning and Development's Communications Team began planning in 2023 to create a recurring process for Development Services work teams to review and provide updates and feedback on their respective webpages. Our intention is to have an approved process and workplan in place by the end of February and to hold the first review meetings by the end of the first quarter 2024.

RECOMMENDATION 1.7

Identify and document applicant guidance in need of improvement

The Department of Community Planning and Development should work with its communications team to identify and document areas where the department may improve applicant guidance for the residential plan review process by streamlining the department's website and simplifying language and instructions about submittal requirements.

Agency response	Agree
Target date to complete implementation activities (Generally expected within 60 to 90 days)	4/30/2024

Specific point of contact for implementation	Name:	Alexandra Foster
	Phone:	720.865.2969
Provide a written response		
<p>The Community Planning and Development Communications Team completed a reorganization of the Development Services section of its website in December 2023, which makes it easier to navigate the website and to locate information on residential and other projects. In addition, plans to create a process for reviewing and updating the website (noted in Recommendation 1.6) will include reviewing content not only for accuracy, but also for clarity, readability and usability. We also anticipate having additional updates to provide on the website at the completion of the Residential Plan Review Guide update effort that began in August 2023.</p>		

RECOMMENDATION 1.8		
Revise guidance and templates for plan review notices		
<p>The Department of Community Planning and Development should revise its existing guidance and templates for information required in plan review notices to ensure plan reviewers are communicating resubmittal requirements thoroughly and consistently.</p>		
Agency response	Agree	
Target date to complete implementation activities (Generally expected within 60 to 90 days)	3/29/2024	
Specific point of contact for implementation	Name:	Mikaela Firnhaber
	Phone:	720.865.2309
Provide a written response		

This is an effort that is already in process as part of the larger Residential Plan Review Guide update effort that began in August 2023. While the update of the standardized plan review notice and comments is anticipated to be complete by the end of March, we anticipate that this documentation will continue to evolve/be updated as needed on an ongoing basis.

In addition, we will work to reinforce the expectation around the usage of the standardized plan review comments across the Residential Plan Review team.

RECOMMENDATION 1.9

Develop and implement policies and procedures for communication across review teams

The Department of Community Planning and Development should work with all review teams involved in the residential permit review process to develop and implement policies and procedures for how and when various teams should be communicating.

Agency response	Agree
Target date to complete implementation activities (Generally expected within 60 to 90 days)	3/29/2024
Specific point of contact for implementation	Name: Evelyn Baker
	Phone: 720.865.2823

Provide a written response

CPD is open to the idea of restarting regularly scheduled multi-agency coordination meetings and other mechanisms to collaborate with our partner agencies around this issue, updating general communication expectations, and defining circumstances/thresholds for when Residential Plan Review staff should reach out to partner agencies. We have, however, made the conscious decision not to dictate how individuals may choose to reach their peers in other review groups.

RECOMMENDATION 1.10

Determine resource needs for answering applicant questions

In conjunction with Recommendation 2.1, the Department of Community Planning and Development should determine whether it has the necessary resources or needs additional resources for dedicated staff to answer applicants' questions on the permitting process.

Agency response	Agree
Target date to complete implementation activities (Generally expected within 60 to 90 days)	6/28/2024
Specific point of contact for implementation	Name: Evelyn Baker
	Phone: 720.865.2823

Provide a written response

CPD regularly assesses staffing levels needed to serve our stakeholders. In addition to the standard approach to completing Strategic Resource Alignment assessments, with the roll out of the Cisco Jabber and Finesse phone system, we now have the ability to track the volume of calls coming in to better assess if additional resources are needed to answer customer phone inquiries. CPD will also examine options to better understand the volume of email inquiries.

RECOMMENDATION 1.11

Develop and implement policies and procedures for reviewing and incorporating feedback

The Department of Community Planning and Development should develop and implement policies and procedures to periodically review applicants' feedback, track trends, and evaluate how feedback should be used to improve existing residential permitting processes.

Agency response	Agree
Target date to complete implementation activities (Generally expected within 60 to 90 days)	6/28/2024

Specific point of contact for implementation	Name:	Megan Rohrer
	Phone:	720.865.2674

Provide a written response

With the guidance of the Director of Performance and Operations, our Customer Experience Administrator is leading a Customer Experience Strategic Planning effort this year. As a part of this effort, an updated approach to reviewing customer feedback from multiple sources will be developed and documented and is expected to be completed by the end of June 2024.

RECOMMENDATION 1.12

Develop and implement guidance to address inquiries and escalations

The Department of Community Planning and Development should develop and implement written guidance for how the residential plan review team should address applicants' inquiries and escalations.

Agency response	Agree
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Target date to complete implementation activities (Generally expected within 60 to 90 days)	2/29/2024
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Specific point of contact for implementation	Name:	Evelyn Baker
	Phone:	720.865.2823

Provide a written response

Currently plan review related work groups are expected to comply with the existing customer service policy that was rolled out to address this item. However CPD is open to revisiting and updating these expectations as needed, and can quickly accomplish this task by February 29, 2024.

RECOMMENDATION 1.13

Limit user access in Accela

The Department of Community Planning and Development should limit staff's user access to specific functions in Accela — to prevent errors arising in the permitting process — including restricting access to the intake queue to only the necessary team members.

Agency response

Disagree

Target date to complete implementation activities (Generally expected within 60 to 90 days)

Click or tap to enter a date.

Specific point of contact for implementation

Name:

Robert Peek

Phone:

720.913.3341

Provide a written response

Within the current configuration of Accela, this recommendation would be an overcorrection that would limit supervisors' and plan reviewers' ability to complete essential functions of their jobs. (The Intake team is expected to identify only the primary required referrals; plan review supervisors and staff are expected to add specialized referrals as needed.)

However, as part of Technology Service's current Accela Modernization efforts, we are open to identifying a new way to add referral reviews to the LOG that would not require modification of the application intake workflow, which would allow us to further restrict access to application intake tasks to the Intake team only.

RECOMMENDATION 1.14

Revise training and guidance for intake staff

The Department of Community Planning and Development should document and revise existing training and guidance to ensure its intake team has the necessary information to accurately determine which reviews are needed for residential permit applications.

Agency response

Agree

Target date to complete implementation activities

6/28/2024

(Generally expected within 60 to 90 days)		
Specific point of contact for implementation	Name:	Khary Clark
	Phone:	720.865.2798
Provide a written response		
<p>As stated in the response to Recommendation 1.13 above, it is not the expectation of the Intake team to be able to identify every referral required for every scope of project. The Intake team identifies the primary referrals; plan review supervisors and staff are expected to identify additional referrals that may be required based on the specific scope of any given project.</p> <p>The Intake team does currently have documented training material; however, we recognize the need to update the training documentation and processes on a regular basis and intend to include the Intake team in the training documentation efforts outlined in response to Recommendation 1.1 above.</p>		

RECOMMENDATION 1.15		
Document and implement policies and procedures to determine data reliability		
<p>The Department of Community Planning and Development should document and implement policies and procedures to periodically evaluate the residential plan review team's data and dashboards to ensure the data is reliable and meets the team's objectives. This process should also include identifying data reliability issues and solutions to address any identified issues.</p>		
Agency response		Agree
Target date to complete implementation activities (Generally expected within 60 to 90 days)		2/29/2024
Specific point of contact for implementation	Name:	Justin Cholewa
	Phone:	
Provide a written response		

CPD's data team does periodically evaluate team performance dashboards to review for code accuracy and visualization enhancements. By 2/29/2024, this process will be formalized and documented, with specific procedures outlined for identifying data reliability issues and steps to resolve.

RECOMMENDATION 1.16

Review and update the programming code

In conjunction with Recommendation 1.15, the Department of Community Planning and Development should periodically review and update the programming code used to create the residential plan review team’s internal and public dashboards to ensure the data is accurate and aligns with current department practices. This process should be documented.

Agency response	Agree
Target date to complete implementation activities (Generally expected within 60 to 90 days)	3/29/2024
Specific point of contact for implementation	Name: Justin Cholewa
	Phone:

Provide a written response

See response to Recommendation 1.15, which outlines a timeline to document the process for reviewing code accuracy by 2/29/2024. In addition to this process being documented, by 3/31/2024 a thorough review will be completed specifically for the "Residential Performance" dashboard to ensure the current code is accurate and aligns with current department practices.

RECOMMENDATION 1.17

Obtain and review documentation on Accela fields

The Department of Community Planning and Development should obtain and review Accela documentation on how fields are populated in the system, including the “due date” and “task status date” fields.

Agency response	Disagree
Target date to complete implementation activities (Generally expected within 60 to 90 days)	Click or tap to enter a date.
Specific point of contact for implementation	Name: Justin Cholewa
	Phone:

Provide a written response

While we agree that obtaining system documentation is important, all existing documentation on Accela fields has already been previously obtained and reviewed by the data team, with two resource options provided:

1. A PDF file, "Data Dictionary of Common Accela Automation Fields"
2. Tables on the back-end server that are able to be queried, with descriptions for each column on each table in the back-end data store

RECOMMENDATION 1.18

Work with Accela to fix errors

The Department of Community Planning and Development should work with Technology Services and Accela to fix the scripting errors that are causing duplicate entries in the system.

Agency response	Agree
Target date to complete implementation activities (Generally expected within 60 to 90 days)	12/31/2024
Specific point of contact for implementation	Name: Robert Peek
	Phone: 720.913.3341

Provide a written response

CPD regularly coordinates with the Development Systems Performance team to identify and address Accela bugs or needed enhancements to forward to Technology Services. This bug is a known issue and is currently on the Technology Service's list of fixes that have been requested.

There is the possibility that this issue may also be addressed as part of Technology Service's Accela Modernization effort that is currently underway.

AUDIT FINDING 2

The residential plan review team needs more consistent, reliable data to effectively allocate staff resources

RECOMMENDATION 2.1	
Develop a formal workforce plan	
<p>The Department of Community Planning and Development should develop a formal workforce plan that addresses the need to maintain adequate resources for the residential permitting process. This plan should align with the department’s mission, goals, and objectives and include:</p> <ul style="list-style-type: none"> • Data elements used to assess workforce needs (e.g., permit volumes, workloads, and trends). • Strategies to address gaps in resources. • Time frames for implementing strategies. • Steps and tools for measuring success, including time frames. • How often to reassess and revise the workforce plan. 	
Agency response	Agree
Target date to complete implementation activities (Generally expected within 60 to 90 days)	12/31/2024
Specific point of contact for implementation	Name: Megan Rohrer
	Phone: 720.865.2674
Provide a written response	
<p>CPD does have a process in place for completing Strategic Resource Alignment (SRA) analyses to better understand needed staffing levels. The SRA looks at development activity trends and economic indicators, and other key data points, to forecast anticipated residential plan review activity levels. The findings of the SRA are key to the development of annual budget proposals.</p> <p>CPD also has a weekly data-driven “STAT” meeting where measures of success are identified and tracked, and where strategies are developed to address gaps in resources.</p> <p>CPD is open to revisiting and updating, if necessary, our SRA methodology and is continually working on addressing the other bullet points identified in this recommendation.</p>	

RECOMMENDATION 2.2

Formally evaluate data

In conjunction with Recommendation 1.15, the Department of Community Planning and Development should conduct and document a formal evaluation of residential plan review team data used to make staffing decisions and determine how to address any data reliability issues or data limitations identified.

Agency response

Agree

Target date to complete implementation activities (Generally expected within 60 to 90 days)

3/31/2024

Specific point of contact for implementation

Name:

Justin Cholewa

Phone:

Provide a written response

In conjunction with Recommendations 1.15 and 1.16, and as part of our internal Strategic Resource Alignment (SRA) process, we will conduct a formal evaluation of residential plan review data to determine team staffing needs by 3/31/2024. This process will be documented and will include notes on how to address data reliability or limitations when drawing staffing conclusions from the volume-based data that is utilized.